IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

RANJITH KEERIKKATTIL

Plaintiff,

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Civil Action No. WMN-13-02016

FREEMAN A. HRABOWSKI, et al. Defendants.

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DEFENDANTS' CONSENT MOTION FOR MODIFICATION OF THE SCHEDULING ORDER

The Defendants, Jeffrey Cullen and Paul Dillon, through counsel and with the consent of the Plaintiff Ranjith Keerikkattil, move to modify the October 8, 2013 Scheduling Order and to allow for a 60 day extension of the discovery deadline and, accordingly, an extension of all other remaining deadlines and, in support of the consent motion state:

- 1. The parties have resolved certain outstanding discovery issues in this matter including an agreement as to Plaintiff's second and third document requests and a resolution of the production to be made under both parties outstanding subpoenas *duces* tecum.
- 2. Pursuant to the agreement and resolution, the parties agreed to request a modification of the October 8, 2013 Scheduling Order such that discovery will be extended an additional 60 days from the current deadline to allow for the taking of any depositions in response to documents produced in under the terms of the agreement

and/or resolution. In addition, no further document requests or subpoena *duces tecum* will be submitted from this point forward by either party.

- 3. In accordance with the agreement and resolution, the Defendants request that the October 8, 2013 Scheduling Order be modified as follows:
 - a. April 20, 2014: Discovery deadline; submission of status report;
 - b. April 27, 2014: Requests for admission
 - c. May 24, 2014: Dispositive pretrial motions deadline; and
 - d. Both parties shall limit the total number of Requests for Admissions to 30 as per LR 104.1 and will serve on the other party on or before March 27, 2014.
- 4. No trial date has been set in this matter and this is the first request to modify the October 8, 2013 Scheduling Order made by any party.

Respectfully submitted,

DOUGLAS F. GANSLER Attorney General of Maryland

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of February, 2014, a copy of the Defendants' Consent Motion For Modification Of The Scheduling Order was served via e-mail, pursuant to Fed. R. Civ. 5(b)(2)(E), and by regular mail to: Ranjith Keerikkattil, 4707 Grand Bend Drive, Catonsville, MD 21228, *Pro Se Plaintiff*.

/s/	
Erik J. Delfosse	